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Director

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VIA ECF

The Honorable Sidney H. Stein
U.S. District Judge, Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Robert Menendez, et al., Case No. 1:23-cr-00490-SHS

Dear Judge Stein:

As the Court is aware, this Firm represents Defendant Wael Hana in the above captioned matter. On behalf of the defendants, and after good faith negotiations with the Government during which many disputes were resolved, we submit the attached Requests to Charge. In an effort to narrow the parties' dispute and to be as efficient as possible in our submission, the defendants have inserted our edits (in redline) to the latest draft provided to us by the Government during our discussions. Given the time constraints, we understand that the final submission by the Government may change and we have not had an opportunity to discuss our final edits and comments with the Government. We, therefore, understand that after reviewing our final edits and comments, the Government may want the opportunity to submit their position and responses to our edits to the Court. We reserve the right to reply to any such responses by the Government and will, of course, continue our discussions with the Government to try to further narrow the areas of disagreement, though we anticipate that some areas will remain in dispute and ultimately require the Court's attention.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

s/Ricardo Solano Jr.

Ricardo Solano Jr., Esq.

cc: All counsel of record (*via ECF*)